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VIA ECF

Hon. Lorna G. Schofield
United States District Judge
40 Foley Square
New York, NY 10007

Re: Pita v. Million Nails Inc., et al. (22-cv-8245)
Stipulation to Extend Time to Answer and Requests

Dear Judge Schofield,

We represent all Defendants in the above-referenced matter. We respectfully move the Court to so-order the enclosed stipulated extension of Defendants' deadline to answer, move, or otherwise respond to the Plaintiff's complaint.

Pursuant to the enclosed stipulation, the Parties have agreed to extend Defendants' time to respond up to and including January 16, 2023. This extension will permit Defendants' counsel to further investigate and the Parties to further communicate regarding Plaintiff's allegations. There have been no prior extensions.

The Parties further request that initial conference scheduled for December 7, 2022 at 4:10pm be adjourned to after January 16, 2023, to allow time for a response. Furthermore, the Parties additionally request a referral for mediation in the Eastern District of New York.

We thank the Court for its time and attention.

Respectfully submitted,
/s/ Joey Tsai
Joey Tsai
Attorney for Defendants

Enclosure

cc: All Counsel of Record (VIA ECF)